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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF TENTH
SUPPLEMENT TO PLAN SUPPLEMENT
IN CONNECTION WITH DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION**

**[Relates to Dkt. Nos. 7037, 7503, 7563, 7712,
7810, 7841, 7879, 7894, 7929, 8057]**

1 **PLEASE TAKE NOTICE** that, on September 9, 2019, PG&E Corporation (“**PG&E Corp.**”)
2 and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively,
3 the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases, filed the
4 *Debtors’ Joint Chapter 11 Plan of Reorganization* [Dkt. No. 3841], which was thereafter amended,
modified, or supplemented on September 23, 2019 and November 4, 2019 [Dkt. Nos. 3966 and 4563,
respectively].

5 **PLEASE TAKE FURTHER NOTICE** that, on December 12, 2019, the Debtors filed the
6 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated December 12,*
7 *2019* [Dkt. No. 5101], which was thereafter amended, modified, or supplemented on January 31, 2020,
8 February 7, 2020, March 9, 2020, March 16, 2020, May 22, 2020, and June 19, 2020 [Dkt. Nos. 5590,
5700, 6217, 6320, 7521, and 8048 respectively] (and as may be further amended, modified, or
supplemented and together with all exhibits and schedules thereto, the “**Plan**”).¹

9 **PLEASE TAKE FURTHER NOTICE** that, on June 20, 2020 (the “**Confirmation Date**”), the
10 United States Bankruptcy Court for the Northern District of California entered the *Order Confirming*
11 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization* [Dkt. No. 8053] (the
“**Confirmation Order**”). The Plan became effective on July 1, 2020 [Dkt. No. 8252].

12 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Paragraph 32.d. of the Confirmation
13 Order, the Debtors and Reorganized Debtors, as applicable, have 30 days from the Confirmation Date
14 to file amendments to the Schedule of Assumed Contracts and the Schedule of Rejected Contracts, to
15 remove executory contracts and unexpired leases previously listed on the Schedule of Assumed
16 Contracts and to add executory contracts and unexpired leases to the Schedule of Rejected Contracts. In
addition, Paragraph 34 of the Confirmation Order authorizes the Debtors or Reorganized Debtors, as
applicable, to consensually resolve any timely filed Cure Disputes without further order of the Court.

17 **PLEASE TAKE FURTHER NOTICE** that, on May 1, 2020, the Debtors filed the *Notice of*
18 *Filing of Plan Supplement in Connection with Debtors’ and Shareholder Proponents’ Joint Chapter 11*
19 *Plan of Reorganization Dated March 16, 2020* [Dkt. No. 7037] (as supplemented on May 22, 2020 [Dkt.
20 No. 7503], May 24, 2020 [Dkt. No. 7563], June 2, 2020 [Dkt. No. 7712], and June 5, 2020 [Dkt. No.
7810], June 8, 2020 [Dkt. No. 7841], June 10, 2020 [Dkt. No. 7879], June 11, 2020 [Dkt. No. 7894],
June 12, 2020 [Dkt. No. 7929], and June 21, 2020 [Dkt. No. 8057] and as may be further amended,
modified, or supplemented, the “**Plan Supplement**”).

21
22 **This Tenth Supplement to the Plan Supplement contains the following:**

- 23 • Exhibit A – Second Amendment to Schedule of Executory Contracts and Unexpired Leases
24 to be Rejected Pursuant to the Plan (the “**Schedule of Rejected Contracts**”)
- 25 • Exhibit B – Third Amendment to Schedule of Executory Contracts and Unexpired Leases to
26 be Assumed Pursuant to the Plan and Proposed Cure Amounts (the “**Schedule of**
27 **Assumed Contracts**” and, together with the Schedule of Rejected Contracts, the
28 “**Contract Schedules**”)

¹ Capitalized terms used but not herein defined have the meanings ascribed to them in the Plan.

1 **PLEASE TAKE FURTHER NOTICE** that the Contract Schedules have been amended to,
2 among other things, (i) add or delete certain agreements as authorized under Paragraph 32.d. of the
3 Confirmation Order, and (ii) revise certain Cure Amounts, contract descriptions, and/or to add or delete
4 certain agreements to reflect the consensual resolution of certain Cure Disputes. Pursuant to Section 8.1
5 of the Plan, the exclusion of any contract or lease from the Schedule of Assumed Contracts shall not
6 constitute a rejection of such contract or unexpired lease. The notices, global notes, and disclaimers that
7 accompanied the Schedule of Rejected Contracts and Schedule of Assumed Contracts, each as modified
8 in the Plan Supplement filed on June 11, 2020, are incorporated herein by reference and apply with equal
9 force with respect to all the agreements set forth in Exhibit A and Exhibit B, annexed hereto.

10 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Paragraph 32.d. of the Confirmation
11 Order:

- 12 (i) any counterparty to an executory contract or unexpired lease that has been
13 added to the Schedule of Rejected Contracts or removed from the
14 Schedule of Assumed Contracts shall have thirty (30) days from the date
15 on which notice of such removal or addition is served on the counterparty
16 to file an objection thereto, which objection may be resolved either
17 consensually without further order of the Bankruptcy Court, or, by a Final
18 Order of the Bankruptcy Court, with any rejection deemed approved as of
19 July 1, 2020; and
- 20 (ii) the rejection of any executory contract or unexpired lease added to the
21 Schedule of Rejected Contracts shall be deemed approved by the
22 Bankruptcy Court as of July 1, 2020 if an objection to the addition of such
23 executory contract or unexpired lease to the Schedule of Rejected
24 Contracts is not timely filed as provided above.

25 For the avoidance of doubt, the counterparty to an executory contract or unexpired lease that is
26 added to the Schedule of Rejected Contracts shall have thirty (30) days to file a claim for rejection
27 damages following the later of (i) July 1, 2020 and (ii) if a timely objection to rejection is filed and is
28 not consensually resolved by the parties, the entry of an order approving the rejection of such executory
contract or unexpired lease.

29 **PLEASE TAKE FURTHER NOTICE** that the Debtors and Shareholder Proponents reserve
30 the right to amend the documents contained in the Plan Supplement in accordance with the terms of the
31 Confirmation Order, the Plan, the Subrogation Claims RSA, the Tort Claimants RSA, the Noteholder
32 RSA, the Backstop Commitment Letters, and the other Plan Documents, as applicable.

33 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
34 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at
35 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate
36 Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC,
37 at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
38 parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note
that a PACER password is needed to access documents on the Bankruptcy Court's website.

1 Dated: July 10, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

2
3 /s/ Thomas B. Rupp
4 Thomas B. Rupp

5 *Attorneys for Debtors and Reorganized Debtors*
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